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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHARON BARNUM, JERRY P. CABEBE,
ROBERT SUSTRIK, and all similarly
situated individuals,

Plaintiffs,

vs

EQUIFAX INFORMATION SERVICES,
LLC,

Defendant.

Case No. 2:16-cv-02866-RFB-NJK

**STIPULATION TO EXTEND
DISCOVERY DEADLINES**

[THIRD REQUEST]

Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs SHARON BARNUM and ROBERT SUSTRIK (“Plaintiffs”), Defendant EQUIFAX INFORMATION SERVICES, LLC (“Equifax”); (together with Plaintiff, the “Parties”), by and through their attorneys, hereby stipulate to stay discovery and to extend discovery deadlines and other deadlines in the December 21, 2017 Scheduling Order as follows:

1. Initial Disclosures.

The parties do not propose any changes to the form of disclosures required pursuant to Federal Rule 26(a). The Parties already served their initial disclosures.

2. Completed Discovery.

This is the third stipulation to continue the class certification briefing schedule. The stipulation is filed in good faith and is not intended to cause delay.

1. 1. On February 28, 2017, the Court entered its Initial Scheduling Order and Protective Order.¹ The Scheduling Order set discovery to close on August 7, 2017.²
2. On May 22, 2017, the Court granted the parties first stipulation to extend discovery 90 days.³
3. Between May 30, 2017 and October 20, 2017, the Parties engaged in extensive discovery, including exchanging written discovery responses, producing documents, and taking depositions of Plaintiffs.
4. On October 20, 2017, the Court granted a 60-day extension of discovery, setting the current close of discovery at January 8, 2018.
5. Between October 20, 2017 and the present, Plaintiffs deposed two Rule 30(b)(6) witnesses of Equifax and served additional written discovery, to which Equifax timely responded. The Parties also engaged in extensive discussions regarding outstanding discovery issues.
6. On December 21, 2017, the Court entered a Scheduling Order setting discovery to close on April 23, 2018.
7. On January 19, 2018, in accordance with the Court's instructions, the Parties filed a Joint Statement, which is currently pending before the Court.

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¹ ECF Nos. 19 & 21, respectively.

² ECF Dkt. No. 10 at 2.

³ ECF Dkt. No. 31 (entering Stipulation to Extend, ECF. No 30).

3. Remaining Discovery.

The Parties are requesting this discovery stay and extension of the discovery deadline to provide time for any remaining fact discovery following the Court's decision on the pending Joint Statement.

4. Reason Why Discovery Has Not Been Completed.

The Parties are holding on any additional fact discovery in order to avoid incurring any unnecessary fees and costs that may be obviated pursuant to the Court's forthcoming order on the Joint Statement.

5. Current Discovery Deadlines.

- Discovery Cutoff: April 23, 2018
- Initial Expert Disclosures and Interim Status Report: February 23, 2018
- Rebuttal Expert Disclosures: March 23, 2018
- Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before May 23, 2018
- Responses to Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before June 22, 2018
- Replies in Support of Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before July 23, 2018
- Joint Proposed Pretrial Order: June 22, 2018

6. Proposed Discovery Deadlines.

WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause supports this request to extend discovery;

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

The December 21, 2017 Scheduling Order shall be amended as follows:

- Discovery shall be stayed for 60 days or until the Court issues an order regarding the pending Joint Statement, whichever occurs first.

- Discovery Cutoff: **June 22, 2018**
- Initial Expert Disclosures and Interim Status Report: **April 23, 2018**
- Rebuttal Expert Disclosures: **May 23, 2018**
- Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before **July 23, 2018**.
- Joint Proposed Pretrial Order: **August 21, 2018**
- Responses to Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before **August 21, 2018**
- Replies in Support of Dispositive Motions and Motion for Class Certification and Appointment of Class Counsel: on or before **September 21, 2018**

IT IS SO STIPULATED.

Dated this 15th day of February, 2018.

/s/ Matthew I. Knepper

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Attorneys for Defendant Equifax Information Services, LLC

ORDER GRANTING STIPULATION TO EXTEND DISCOVERY DEADLINES

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: February 16, 2018